

EXHIBIT 2

1 UNITED STATES OF AMERICA *

2 v. * CASE NO. 5:21-cv-1085-XR

3 THE STATE OF TEXAS, et al *

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6 ORAL AND VIDEOTAPED DEPOSITION OF

7 ISABEL LONGORIA

8 APRIL 20, 2022

9 VOLUME 1 OF 1

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11 Oral and videotaped deposition of Isabel Longoria,

12 produced as a witness at the instance of the defense, and duly

13 sworn, was taken in the above-styled and numbered cause on April

14 20, 2022, from 9:24 a.m. to 2:32 p.m., before Terrie Doyle

15 Escobar, CSR in and for the State of Texas, reported by oral

16 stenography, at the Office of the Texas Attorney General,

17 Consumer Protection Division, Houston Regional Office, 808 Travis

18 Street, Suite 1520, Houston, Texas 77002, pursuant to Rule 30 of

19 the Federal Rules of Civil Procedure.

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1 A. Yes.

2 Q. Do you remember that being controversial?

3 A. Yes.

4 Q. Did Harris County have to -- strike that. Did Harris
5 County make changes to its election procedures in light of the
6 pandemic?

7 A. Yes.

8 Q. Was one of those changes drive-through voting?

9 A. Yes.

10 Q. Has Harris County ever allowed drive-through voting
11 before 2020?

12 A. Not to my knowledge.

13 Q. Was another of the changes Harris County made 24-hour
14 voting?

15 A. Yes.

16 Q. Has Harris County ever allowed 24-hour voting before
17 2020?

18 A. Not to my knowledge.

19 Q. What else would you list as major changes that -- major
20 changes to election procedures in Harris County as a result of
21 the pandemic in 2020?

22 A. Harris County implemented in 2020 online election
23 worker training, whereas before they had been strictly in-person
24 trainings, to help account for, you know, the safety of having
25 individuals -- or not having as many individuals in one physical

1 space together, other COVID procedures related to the requirement
2 of wearing masks, of hand sanitizing stations, staying six feet
3 apart, moving machines six feet apart, and other reasonable
4 measures to kind of limit the -- or expand the space and limit
5 the people interactions to help decrease the transmission of
6 COVID in voting stations.

7 Q. Some people use the term "drop boxes" to describe
8 Harris County election procedures in 2020. Have you heard that?

9 A. Yes.

10 Q. What does that mean?

11 A. I understand drop boxes to be places by which
12 individuals may return their mail ballots -- mail ballot carrier
13 envelopes in person.

14 Q. Had Harris County allowed the in person return of
15 carrier envelopes before 2020?

16 A. Yes.

17 Q. Were the procedures different in 2020 than they had
18 been before?

19 A. Yes.

20 Q. How so?

21 A. If I'm remembering correctly -- essentially, if I
22 remember correctly, the governor's order allowed for the in-
23 person return of mail ballot carrier envelopes for a longer
24 period, whereas before and since that order, mail ballot carrier
25 envelopes could only be returned in person on election day.

1 of the county clerk's office in 2018; correct?

2 A. No.

3 Q. And you have no personal knowledge about the inner
4 workings of the county clerk's office at any time prior to 2018;
5 correct?

6 A. Correct.

7 MR. FOMBONNE: That's all I have.

8 MR. THOMPSON: Nothing further for me.

9 THE VIDEOGRAPHER: Off the record, and the time is
10 2:32.

11 (Proceedings concluded at 2:32 p.m.)
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